#### **EXHIBIT 4**

# REDACTED VERSION OF DOCUMENT SOUGHT TO BE SEALED

### Case 3:17-cv-00939-WHA Document 2543-3 Filed 01/28/18 Page 2 of 6 HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY

1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
3	SAN FRANCISCO DIVISION
4	000
5	
6	WAYMO LLC,
7	Plaintiff,
8	vs. No. 3:17-cv-00939-WHA
9	UBER TECHNOLOGIES, INC.;
	OTTOMOTTO LLC; OTTO TRUCKING,
10	INC.,
11	Defendants.
12	
13	HIGHLY CONFIDENTIAL ATTORNEYS' EYES ONLY
14	
15	WAYMO LLC RULE 30(b)(6)
16	VIDEOTAPED DEPOSITION OF PIERRE-YVES DROZ
17	PALO ALTO, CALIFORNIA
18	THURSDAY, AUGUST 3, 2017
19	
20	
21	REPORTED BY:
22	ANDREA M. IGNACIO, CSR, RPR, CRR, CCRR, CLR ~
23	CSR LICENSE NO. 9830
24	JOB NO. 2663199
25	PAGES 1 - 371
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1	UNITED STATES DISTRICT COURT
2	NORTHERN DISTRICT OF CALIFORNIA
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5	WAYMO LLC,
6	Plaintiff,
7	vs. No. 3:17-cv-00939-WHA
8	UBER TECHNOLOGIES, INC.;
	OTTOMOTTO LLC; OTTO TRUCKING,
9	INC.,
10	Defendants.
11	
12	
13	Videotaped Deposition of Pierre-Yves Droz
14	taken on behalf of the Defendant, on August 3,
15	2017, at Morrison & Foerster LLP, 950 Page Mill
16	Road, Palo Alto, California, beginning 9:27 a.m.,
17	and commencing at 7:25 p.m., Pursuant to Notice,
18	and before me, ANDREA M. IGNACIO, CSR, RPR, CRR,
19	CLR ~ License No. 9830.
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24	
25	
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1		
1		
		13:33
<b>,</b>	MR. KIM: All right.	13:33
	Q So I I don't understand why you're saying	13:33
	from your personal knowledge. You know, we we	13:33
	looked earlier at your deposition topics.	13:33
	A Yep. Okay.	13:33
	Q And Exhibit 1273 specifically asks for the	13:33
	time cost and specific people involved in developing	13:33
	each of the alleged trade secrets.	13:33
	MR. JAFFE: Which topic are you reading from?	13:33
:	MR. KIM: Deposition Topic No. 9.	13:33
ı	Q And so I'm asking you about the the cost	13:33
:	to implement	13:33
	A So, are you asking what	13:34
	Pa	ge 154

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1	THE WITNESS: Sorry. Go ahead.	13:34
2	MR. JAFFE: One one second here.	13:34
3	THE WITNESS: Yes.	13:34
4	MR. JAFFE: So, Mr. Droz is here subject to	13:34
5	our objections. As I stated at the outset of this	13:34
6	deposition, he's designated on the development of the	13:34
7	asserted trade secrets other than 25. So I just want	13:34
8	to make that clear for the record.	13:34
9	Go ahead.	13:34
10	THE WITNESS:	
		13:35
25	MR. JAFFE: Objection; form; outside the	13:35
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1	scope.	13:35
2	THE WITNESS:	
		13:35
10	MR. KIM: Q. So, you're not prepared to talk	13:35
11	about the cost of development of Trade Secret No. 2 as	13:35
12	Waymo's corporate designated witness; is that correct?	13:35
13	A I'm not.	13:35
14	(Document marked Exhibit 1278	13:36
15	for identification.)	13:36
16	THE VIDEOGRAPHER: 1278.	13:36
17	THE WITNESS: Thank you.	13:36
18	MR. KIM: So I've marked for identification,	13:36
19	as Exhibit No. 1278, an e-mail from John McCauley at	13:36
20	Quinn Emanuel, dated Wednesday, August 2nd, 2017, at	13:36
21	7:56 p.m.	13:36
22	Q And, if you look at the second paragraph, it	13:36
23	says:	13:36
24	"Waymo designates Mr. Droz to testify with	13:36
25	regard to Topics 9 and 10 of Uber's second 30(b)(6)	13:37
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